

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JULIA ROSSI, DELILAH PARKER and
KELVIN HOLMES, Individually and on
Behalf of All Others Similarly Situated,

Plaintiffs,

V.

CLAIRE'S STORES, INC.; CLAIRE'S
BOUTIQUES, INC.; and CBI
DISTRIBUTING CORP.,

Defendants.

Case No.: 1:20-cv-5090

Hon. Andrea R. Wood

Hon. Magistrate Heather K. McShain

**JOINT MOTION FOR ENTRY
OF AGREED CONFIDENTIALITY AND CLAWBACK ORDER**

Plaintiffs Julia Rossi, Delilah Parker and Kelvin Homes, along with Defendants Claire's Stores, Inc., Claire's Boutiques, Inc., and CBI Distributing Corp., by and through their respective attorneys, and in support of their Joint Motion for Entry of Agreed Confidentiality and Clawback Order, Plaintiffs and Defendants state as follows:

1. Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Plaintiffs and Defendants jointly move for entry of the [Proposed] Agreed Confidentiality and Clawback Order attached hereto as Exhibit A.

2. The [Proposed] Agreed Confidentiality and Clawback Order was adopted from the L.R. 26.2 Model Protective Order.

3. The proposed order has been negotiated through a meet and confer process and is agreed to by all parties.

WHEREFORE, Plaintiffs Julia Rossi, Delilah Parker and Kelvin Homes and Defendants Claire's Stores, Inc., Claire's Boutiques, Inc.; and CBI Distributing Corp jointly and respectfully request that the Court enter the agreed Order attached hereto at Exhibit A.

DATED: March 1, 2021

/s/ Carl V. Malmstrom

Tina Wolfson
twolfson@ahdootwolfson.com
Bradley K. King
bking@ahdootwolfson.com
Theodore W. Maya
tmaya@ahdootwolfson.com
Henry Kelston
hkelston@ahdootwolfson.com
AHDOOT & WOLFSON, PC
2600 West Olive Avenue, Suite 500
Burbank, California 91505
Tel: (310) 474-9111
Fax: (310) 474-8585

M. Anderson Berry
aberry@justice4you.com
Leslie Guillon
lguillon@justice4you.com
CLAYEO C. ARNOLD,
A PROFESSIONAL LAW CORP.
865 Howe Avenue
Sacramento, California 95825
Tel: (916) 777-7777
Fax: (916) 924-1829

Katrina Carroll
kcarroll@carlsonlynch.com
Kyle A. Shamberg
kshamberg@carlsonlynch.com
CARLSON LYNCH LLP
111 West Washington Street, Suite 1240
Chicago, Illinois 60602
Tel: (312) 750-1265

Rachele R. Byrd
byrd@whafh.com
WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP
750 B Street, Suite 1820

San Diego, CA 92101
Tel: (619) 239-4599
Fax: (619) 234-4599

Carl V. Malmstrom
malmstrom@whafh.com
**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLC**
111 W. Jackson Blvd.,
Suite 1700 Chicago, Illinois 60604
Tel: 312/984-0000
Fax: 212/545-4653

Counsel for Plaintiffs and the Proposed Class

/s/ Gilbert S. Keteltas

John S. Letchinger
Maria Boelen
BAKER HOSTETLER LLP
One North Wacker Drive
Suite 4500
Chicago, IL 60606
jletchinger@bakerlaw.com
mboelen@bakerlaw.com
Ph: 312.416.6200
Fax: 312.416.6200

Gilbert S. Keteltas (admitted *pro hac vice*)
Carey S. Busen (admitted *pro hac vice*)
BAKER HOSTETLER LLP
1050 Connecticut Ave., NW
Suite 1100
Washington, DC 20036
gketeltas@bakerlaw.com
cbusen@bakerlaw.com
Ph: 202.861.1500
Fax: 202.861.1783

Counsel for Defendants

CERTIFICATE OF SERVICE

I, Carl V. Malmstrom, an attorney, hereby certify that on this 1st day of March, 2021, I caused a copy of the foregoing document to be served on all Filing Users through the Court's ECF System.

Dated: February 26, 2021

/s/ Carl V. Malmstrom
Carl V. Malmstrom